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May 10, 2021

## **VIA ECF**

The Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, New York 10007

Re: McKinnon v. MDC Partners Inc., et al., 1:21-cv-2381-DLC  
Wang v. MDC Partners Inc., et al., 1:21-cv-1126-DLC

Dear Judge Cote:

We represent Plaintiff McKinnon in the first above referenced action. Gloria Kui Melwani represents Plaintiff Wang in the second above referenced action. The plaintiffs in the above actions submit this letter to respectfully request an adjournment of the initial pretrial conference currently scheduled in these actions for May 14, 2021 at 11:30 am. We have spoken with counsel for defendants who informed us that defendants do not oppose this request.

Plaintiff Wang commenced her individual action by filing a complaint on February 8, 2021, challenging certain disclosures in the Registration Statement (“Registration Statement”) on Form S-4 filed with the Securities Exchange Commission in connection with the proposed acquisition of MDC Partners Inc. (“MDC”) by Stagwell Media LP (“Stagwell”) (the “Proposed Transaction”). Plaintiff McKinnon commenced his individual action by filing a complaint on March 18, 2021, similarly challenging certain disclosures in the Registration Statement.

The Court previously granted Plaintiffs’ April 13, 2021 request to adjourn the initial pretrial conference scheduled for April 16, 2021 in light of discussions between the parties concerning potential additional disclosures to be made by MDC that would moot the complaints. The discussions between the parties are still ongoing.

Since Plaintiffs’ last update to the Court, the Company has scheduled its special meeting of shareholders to vote on the Proposed Transaction for June 22, 2021. Accordingly, in order to give the parties sufficient time to complete their discussions in advance of the special meeting, Plaintiffs jointly request that the Court adjourn the May 14, 2021 conference until a date after June 25, 2021 that is convenient to the Court.

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Sincerely yours,



Joshua M. Lifshitz

cc:      Gloria Kui Melwani, Esq.  
          Mark E. McDonald, Esq.